

**Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the matter of)
)
) MM Docket 99-25
Creation of a Low Power Radio Service)
)

Reply Comment Executive Summary

- Modify and extend the freeze on translator applications
- Act on the *Emergency Translator Petition*
- Grant LPFM-100 and LPFM-10 priority over translators
- Eliminate third channel interference protection
- Maintain the 18 month construction permit time frame
- Expeditiously open a filing window for LPFM-10 stations

Full Text

Optima Enrichment, Inc. is a community-based non profit organization based in Brookfield, WI, that seeks to enrich its community through improved educational methods.

We concur with the September 15, 2005 comments of Prometheus Radio Project, *et al.* in regards to the freeze on translator applications. Organizations have clearly and blatantly abused the FCC's March 2003 application window. When two organizations have filed for 19 translators in Jamestown, ND, one translator for every 795 people in that city, there must be action taken by the Federal Communications Commission. This is best done by freezing all applications filed by organizations filing more than five (5) translator applications, and acting on the *Emergency Translator Petition* filed by Prometheus Radio Project.

We also concur with petitions filed by many that LPFM-100 and LPFM-10 be given priority over translators, in the interest of localism. Out of market radio has many distribution channels (satellite, internet, telephone, etc.) that local organizations do not have.

We also concur with petitions filed that third channel interference protection be eliminated. LPFM cannot exist in medium to large markets without this change.

We disagree with the filings from Eureka College and others petitioning for an extension of the 18 month construction permit time frame. Allowing an addition 18 months will stall the rollout of LPFM and will enable the committed to use LPFM while freeing up expired construction permits from those who were unable to begin LPFM in a timely manner.

Finally, we urge the Commission to expeditiously open a filing window for LPFM-10, on the condition that third channel interference protection is lifted. This will enable virtually all community organizations to use Low Power FM.